

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

V.

TAREK MEHANNA

Defendant.

Crim. No. 08-MJ-0148-LTS

**GOVERNMENT'S MOTION FOR ADDITIONAL TIME TO RESPOND
TO INFORMATION COLLECTED BY PRE-TRIAL SERVICES AND FOR FULL
ACCESS TO SAID MATERIAL**

The United States, by and through Michael J. Sullivan, United States Attorney, and Alope S. Chakravarty and Jeffrey Auerhahn, Assistant U.S. Attorneys, for the District of Massachusetts, respectfully submits this Motion in order to have additional time to review and to copy the materials collected by Pre-Trial Services (PTS) so that they can be brought to the U.S. Attorney's Office and can be used to prepare a response to the information and states as follows:

1. Shortly before 10:00 a.m. today, the Court directed PTS to make available for the government's review certain information PTS has collected relevant to the issues before the court; the Court also directed the government to respond to this information, if it wished, by 12:00 p.m. tomorrow.
2. Counsel for the United States were both occupied in a proceeding until after 1:00 p.m today, and have not had meaningful opportunity to access the materials.
3. A conversation with PTS has revealed that there are approximately 50 pages of materials to review in order to prepare a response, and it is their understanding that the materials cannot be removed from their office, consistent with their practice with regard to Pretrial Service Reports.

4. In order to effectively review these materials and prepare a response, the government will require full access to the materials, as well as adequate time to review them while being able to incorporate the information into a response.

Wherefore, the government respectfully requests the following:

1. PTS be directed to make a separate copy of the materials for the government, and provide that copy to the government.
2. The government be permitted to take the materials to its office, review and work with the materials.
3. The government be permitted until the close of business on Monday, December 8, 2008, to file its response to the materials.
4. The government be permitted to return the materials to PTS, without making copies of the materials, upon conclusion of any hearings regarding this matter.

Wherefore, the government respectfully requests that the Court allow this motion.

Counsel for the defendant assents to the government's request to be able to bring the materials to its office for purposes of preparing a response.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Alope Chakravarty
ALOE S. CHAKRAVARTY and
JEFFREY AUERHAHN
Assistant United States Attorneys

Dated: December 4, 2008

Certificate of Service

I do hereby certify that I have conferred with counsel pursuant to L.R. 7.1(A)(2) and a copy of the foregoing motion was served upon the counsel of record for the defendants by electronic notice on this 4th day of December 2008.

/s/ Alope Chakravarty
Alope Chakravarty
Assistant U.S. Attorney